

Davis | Goldberg | Galper^{PLC}

September 7, 2018

BY FIRST CLASS MAIL AND EMAIL

The Honorable Ron Wyden
United States Senate
221 Dirksen Senate Office Bldg.
Washington, D.C. 20510

The Honorable Richard Blumenthal
United States Senate
706 Hart Senate Office Bldg.
Washington, D.C. 20510

The Honorable Sheldon Whitehouse
United States Senate
530 Hart Senate Office Bldg.
Washington, D.C. 20510

The Honorable Elizabeth Warren
United States Senate
317 Hart Senate Office Bldg.
Washington, D.C. 20510

Dear Senators:

We represent Outdoor Sportsman Group (“OSG”) and write to respond to your July 26, 2018 letter addressed to OSG Chief Executive Officer Jim Liberatore. We respect and appreciate your interest and inquiry into foreign interference in our elections and the December 2015 trip to Russia that Mr. Liberatore joined (the “trip”). We hope this response addresses the issues your letter raised.

As background, OSG is a global digital, television, and print media company that creates and provides entertainment content for outdoor lifestyle enthusiasts. OSG owns, among other media properties, the Outdoor Channel (“OC”) and MyOutdoorTV (“MOTV”), a mobile streaming app for on-demand content available in 192 countries. Given its global reach, OSG often explores and sometimes develops original content in foreign countries as well as content geared toward foreign audiences and has used consultants to do so at times. For a very brief period in 2016, Maria Butina was one such consultant.

At the time of the trip, Mr. Liberatore served as CEO of OC and MOTV. One country that interested him for both potential foreign content and audience market was Russia, as President Putin was a noted conservationist and outdoor enthusiast, and Russia had a sizable outdoor lifestyle culture. Mr. Liberatore believed audiences would be interested in content about that culture, including Mr. Putin's outdoor pursuits.

Consequently, after Mr. Liberatore learned that the National Rifle Association (the "NRA") was traveling to Russia, Mr. Liberatore asked the NRA if he could join the trip. OC and MOTV have a programming and commercial relationship with the NRA. He thought the trip would be a way to learn more about the Russian market and help gauge its potential for content creation. Mr. Liberatore's purpose was purely commercial and not related in any way to U.S. politics or gun rights.

OC paid for Mr. Liberatore's travel to and from Russia. Mr. Liberatore was told before the trip that the Right to Bear Arms group would pick up the lodging, meals, and transportation expenses in Russia, although Mr. Liberatore paid personally for his own hotel incidental charges. After the trip, he learned those expenses might have been \$6,000. It is possible that the NRA paid those expenses, but Mr. Liberatore does not know who ultimately paid them. Apart from those expenses, he received no remuneration from anyone.

Mr. Liberatore met Ms. Butina on the trip. He was informed before the trip that Ms. Butina and Alexander Torshin would be among the trip's hosts from the Right to Bear Arms group. Ms. Butina served as the group's guide, and it appeared to Mr. Liberatore that the Right to Bear Arms group had organized the events in coordination with the NRA. Mr. Liberatore interacted in passing with Mr. Torshin and Dmitry Rogozin at group events, but Mr. Liberatore had no one-on-one meetings with them. He was not aware at the time that Mr. Rogozin was subject to U.S. sanctions, had never communicated with him before the trip, and has not done so since. Similarly, Mr. Liberatore had not met nor communicated with Mr. Torshin before the trip, and has not done so since. Mr. Liberatore is unaware of whether he interacted with any other individuals on the trip who may have been the subject of U.S. sanctions.

Based on Ms. Butina's representations during and after the trip, Mr. Liberatore was led to believe that Ms. Butina could be helpful as an in-country consultant exploring Russian-origin content. In particular, OSG wanted to produce one or several programs that would tell of Mr. Putin's conservation efforts through his eyes, highlighting the works of the Russian Geographical Society. For example, OSG was interested in programming focused on the protection of such endangered species as the Snow Leopard, Siberian Tiger, and Beluga White Whale.

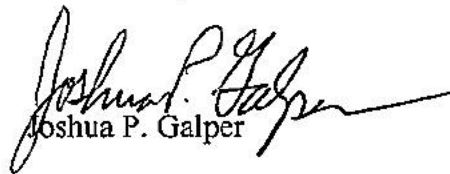
In March 2016, OSG's programming development and production subsidiary engaged Ms. Butina as a pre-production, independent contractor through Bridges LLC, her U.S.-based consulting firm. Neither Mr. Liberatore, nor to our knowledge anyone at OSG, has ever met Paul Erickson. Ms. Butina's scope of work included researching and exploring the participation of President Putin and his staff in potential television

programming, seeking the support of Russian outdoor-related, non-governmental organizations for the programming, and serving as a cultural and linguistic liaison.

Bridges LLC was originally engaged for six months at a rate of \$5,000 per month plus some expenses, but the consulting agreement was terminated after four months in June 2016 because Ms. Butina made no progress in this effort. Later in the year, Ms. Butina reached out on an unsolicited basis and asked to revive the consulting arrangement. The company did not do so, and OSG has not pursued Russian-origin content since June 2016.

We hope this response is of value in your inquiry. If you have any additional questions, please contact me at [REDACTED].

Sincerely,


Joshua P. Galper